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*Attorneys for defendants Threshold Pharmaceuticals, Inc.,  
Harold E. Selick, and Janet I. Swearson*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JERRY TWINDE, On Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

THRESHOLD PHARMACEUTICALS, INC.,  
HAROLD "BARRY" E. SELICK and JANET I.  
SWEARSON,

Defendants.

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RAYNOLD L. GILBERT, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

THRESHOLD PHARMACEUTICALS, INC.,  
HAROLD "BARRY" E. SELICK and JANET I.  
SWEARSON,

Defendants.

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Civil Action No.: 07 CV 6227 JSR  
Consolidated with 07 CV 6490 JSR

NOTICE OF DEFENDANTS' MOTION  
TO TRANSFER VENUE UNDER 28  
U.S.C. § 1404(a)

PLEASE TAKE NOTICE that on September 10, 2007, at 2:00 p.m. before the Honorable  
Jed S. Rakoff, United States District Court Judge, in the Daniel Patrick Moynihan United States  
Courthouse, 500 Pearl St., Room 1340, New York, NY, 10007, Defendants will move for an

order transferring the above-referenced actions to the Northern District of California pursuant to 28 U.S.C. § 1404(a) for the convenience of the parties and witnesses and in the interest of justice. Defendants' Motion is based on the accompanying Memorandum of Points and Authorities, the declarations of Harold E. Selick, Janet I. Swearson, Cathleen P. Davis and Jeannine Reyes filed concurrently herewith, and such further evidence and argument as may be presented to the Court at or before the hearing. Pursuant to the Court's direction, the schedule pertaining to Defendants' motion is:

- |                                 |                               |
|---------------------------------|-------------------------------|
| • August 17, 2007               | Defendants' Moving Papers     |
| • August 31, 2007               | Plaintiffs' Opposition Papers |
| • September 4, 2007             | Defendants' Reply Papers      |
| • September 10, 2007, 2:00 p.m. | Hearing                       |

DATED: August 16, 2007

HELLER EHRMAN LLP

By /S/ Kevin A. Burke

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